

ORIGINAL

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
	)	
Implementation of Section 17	)	ET Docket No. 93-7
of the Cable Television Consumer	)	
Protection and Competition	)	
Act of 1992	)	
	)	
Compatibility Between	)	
Cable Systems and Consumer	)	
Electronics Equipment	)	
	)	

**COMMENTS OF DISCOVERY COMMUNICATIONS, INC.**

Discovery Communications, Inc. ("Discovery"), by its attorneys, hereby submits its comments in the Commission's above-noted Notice of Inquiry ("NOI") regarding the establishment of compatibility standards between cable systems and consumer electronics. In particular, Discovery responds to the Commission's specific question as to how new technologies such as Discovery's Your Choice TV™ ("YCTV") can be affected by the determinations it will reach in this proceeding. NOI at 13, n.19.

**I. INTRODUCTION**

Discovery owns and operates the Discovery Channel and The Learning Channel. The Discovery Channel, founded in 1985, features nonfiction documentaries about science, nature, technology, human events and history. It attempts to reach an audience not adequately served by existing over-the-air broadcasters. The Discovery Channel now reaches

about 59 million subscribers and viewer polls demonstrate it is one of the most enjoyed and appreciated cable networks in the country.

The Learning Channel was acquired by Discovery in 1991. It features educational programs on subjects such as history, science, archeology, and anthropology for viewers of all ages. It also provides six hours of commercial-free educational programming for preschoolers every weekday morning. Discovery's mission for both channels is to use the power of television to educate as well as entertain viewers.

Discovery is also deeply involved in developing a technologically advanced program packaging and delivery system that will permit virtual video-on-demand and will also make the emerging multi-channel video environment user friendly. This system, known as Your Choice TV™ ("YCTV"), is based on the latest advances in semiconductor manufacturing and computer technology, as well as the most sophisticated digital compression techniques available. It is a satellite-based interactive program package and reception system involving not only a set-top terminal, but also a national operations center (which digitally compresses and packages programming for transmission via a satellite).

YCTV is designed to give consumers the ability to receive and easily interact with 500 or more channels of programming. In such an environment viewers can be overwhelmed by the sheer number of alternatives -- simply "grazing" through 500 channels could take as much as 45 minutes. Thus, YCTV utilizes the 500 channels made possible by compression techniques, a special user friendly interface with programming menus and an "eye-off-the-remote" designed remote control unit so that viewers can effectively and quickly evaluate their programming options and order their program of choice.

Graphically created program and subject menus resident in a set-top terminal, will be addressed and updated from the operations center. Subscribers, using their ergonomically-designed remote controls,<sup>1</sup> will be able to scroll through menus and select and/or pre-program the entertainment desired using either conventional channel numbers or subject and

It is critical for the Commission to ensure that, in achieving compatibility, it does not inadvertently erect barriers to the development and implementation of new technologies and services, such as Your Choice TV, designed to meet these consumer needs as they arise.

Discovery strongly urges that any rules promulgated by the Commission be sufficiently

Accordingly, in addition to working in close consultation with industry representatives in developing the report to Congress, Discovery urges the Commission to consider establishing a broad-based advisory committee or using regulatory negotiation in the development of any regulations needed to ensure compatibility between consumer electronics equipment and the cable industry.<sup>1</sup> In this way, the Commission can best ensure that its regulations do not have the adverse effect of restricting technological advances by locking in current technology that will inevitably become outmoded.

### III. CONCLUSION

Discovery respectfully urges the Commission to recognize that the public interest is not served by ensuring technical compatibility between cable-provided and subscriber-provided equipment at the cost of freezing technology. Standards established in this

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<sup>1</sup> The Commission recently followed such an approach in establishing regulations to define technical rules appropriate to the provision of mobile-satellite services. See Public Notice in CC Docket No. 92-166, 7 FCC Rcd 5241 (1992).

proceeding need to ensure not only compatibility between various pieces of equipment, but also the flexibility to allow for technological progress and future consumer demands.

Respectfully submitted,

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## Attachment A

Your Choice TV™  
Remote Control Unit



